

EXHIBIT J

**Email from A. McDonald to C. Simpson
Re: DFA's Proposed Custodians and Search Terms for Plaintiffs'
2nd Set of Requests for Production to DFA
September 21, 2020**

From: AMcDonald@bakerandmiller.com
To: [Simpson, Carter C.](#); [Bakowski Alan W.](#)
Cc: [Cooney III, James P.](#); [Powell, Brent](#); Sarah.Stone@wbd-us.com; TMiller@bakerandmiller.com; ECastillo@bakerandmiller.com; michael.egge@lw.com; [Phair, Ryan P.](#); [Martin, Jack](#); [Hahm, Kevin](#); [Oeltjenbruns, Kelly](#); [Rich, Ryan G.](#); [Lamberth, James A.](#); eglavich@bakerandmiller.com
Subject: DFA's Proposed Custodians & Search Terms for Pls" 2nd Set of RFPs to DFA
Date: Monday, September 21, 2020 5:58:15 PM
Attachments: [Custodians & Search Terms 2nd RFPs 9.21.20.xlsx](#)

Alan and Carter,

Attached please find a list of individuals who DFA believes are reasonably likely to have non-duplicative documents responsive to those Requests within Plaintiffs' Second Set of Requests for Production that are appropriate for custodial review, as well as proposed search terms for identifying documents that may be responsive to Plaintiffs' Second Set of Requests for Production to DFA, subject to DFA's Responses and Objections. The selection of custodians or search terms do not constitute an admission as to the relevance or admissibility of documents containing the proposed terms or of the matters raised in Plaintiffs' Second Set of Requests. DFA reserves the right to amend or modify all proposed custodians and search terms.

Thank you,

Amber

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Request No. 1 1	
<u>Custodians</u>	<u>Search Terms</u>
Randy Mooney	Dean* w/10 (buy* OR purchas* OR acqui* OR bid* OR deal* or asset*)
Rick Smith	Dove* w/10 (buy* OR purchas* OR acqui* OR bid* OR deal* or asset*)
Greg Wickham	Dragon w/10 (buy* OR purchas* OR acqui* OR bid* OR deal* or asset*)
Krista Piper	"Project Creamery" w/10 (buy* OR purchas* OR acqui* OR bid* OR deal* or asset*)
Deana King	

Will add (Board OR Director* OR Committee* OR Chairman) on above results for all custodians, with exception of Randy Mooney

Req No. 22	
<u>Custodians</u>	<u>Search Terms</u>
Alan Bernon	Winston* w/5 (plan* OR sell* OR sale* OR idl* OR shutdown* OR "shut down" OR clos* OR expand* OR increas* OR grow*)
Rick Smith	(HP OR H.P. OR H-P OR "High Point") w/5 (plan* OR sell* OR sale* OR idl* OR shutdown* OR "shut down" OR clos* OR expand* OR increas* OR grow*)
Greg Wickham	Spartanburg w/5 (plan* OR sell* OR sale* OR idl* OR shutdown* OR "shut down" OR clos* OR expand* OR increas* OR grow*)
Krista Piper	Carolina* w/5 (plan* OR sell* OR sale* OR idl* OR shutdown* OR "shut down" OR clos* OR expand* OR increas* OR grow*)
Deana King	"NC" w/5 (plan* OR sell* OR sale* OR idl* OR shutdown* OR "shut down" OR clos* OR expand* OR increas* OR grow*)
Randy Mooney	"N.C." w/5 (plan* OR sell* OR sale* OR idl* OR shutdown* OR "shut down" OR clos* OR expand* OR increas* OR grow*)
Tom Murray	"SC" w/5 (plan* OR sell* OR sale* OR idl* OR shutdown* OR "shut down" OR clos* OR expand* OR increas* OR grow*)
	"S.C." w/5 (plan* OR sell* OR sale* OR idl* OR shutdown* OR "shut down" OR clos* OR expand* OR increas* OR grow*)